



Kettle Range

CONSERVATION GROUP

CQ577

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NEPA Task Force
P.O. Box 221150
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Dear NEPA Task Force:

On behalf of the Board of Directors and over 800 member families of the Kettle Range Conservation Group, please accept these comments to some of your questions regarding any proposals to change or weaken the National Environmental Policy Act (NEPA).

A-2) We rely on both CD-ROM and other electronic versions (e-mail and web site pages) of NEPA documents, including EIS, EA and other documents; however, these technology-dependent sources of information are not sufficient. We also rely on the printed versions of many of these documents, especially lengthy EIS and EA documents, to write comments and appeals. Kettle Range Conservation Group members and volunteers also rely on both electronic and printed sources of information. Many of these members of the public cannot afford the expensive technologies required to utilize electronic versions of NEPA related information, and for this reason, we ask you to not to decrease the availability of free printed information related to the NEPA process, as such a decision would limit public participation and weaken the democratic process inherent in NEPA.

Improvements to the accessibility of electronic versions of NEPA related information would also help encourage public participation. Often times agency-produced CD's do not function well. For instance, when reading through CD, PDF versions of many EIS documents for the Colville and Okanogan National Forests, selecting and copying from the text is frequently problematic, as some paragraphs will not copy. While such flaws are inevitable, it only reinforces the need for agencies to be required under NEPA to provide free access to printed versions of NEPA related information to the public.

A-5) Both paid employees of Kettle Range Conservation Group and non-paid volunteers from the public use information regarding proposed actions and NEPA related documents. While we do use CD-ROM and web site versions of such information, we primarily use printed versions of such information to distill and share with our members and the public and to prepare comments and appeals on NEPA analysis and related documents. As I noted in question A-2, there are inherent downfalls to electronic versions of such information, including flaws in the sources themselves, limited public access to computers and other related technology, slow internet access and problems with servers, and needs of busy, working volunteers to carry versions of NEPA related information around with them to be reviewed at their leisure. Because of the

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overwhelming public need for paper versions of all NEPA related analysis and documentation, it is necessary that such paper sources be provided to the public at no cost, thus ensuring ongoing public participation in all levels of NEPA analysis, as the law's architects intended.

6-A) See answers to questions A-2 and A-3. Many members of the public here in Northeastern Washington do not have computers or access to the Internet, and thus rely on paper sources for NEPA related analysis, documentation, and information. While e-mail and web site announcements of NEPA related projects and public meetings are helpful, they do not meet the needs of those members of the public that do not have access to expensive computer technologies. Such information and announcements of opportunities for public involvement need to be provided in print form, for example, in local newspapers, flyers, mailings, etc. Many members of the public that have an interest in NEPA related analysis, documentation and communication cannot afford to pay for the cost of public documents such as EIS and EA documents. It is necessary that such paper sources be provided to the public at no cost, thus ensuring ongoing public participation in all levels of NEPA analysis, as the law's architects intended.

C) In the future, please define terms such as "programmatic analysis," "tiering," and other jargon that will complicate comprehension and commenting by the non-expert public.

D) Likewise, terms like "adaptive management strategies" should be briefly defined. In response to these questions, it is easy to imagine how this proposal could be abused by agency personnel who may be anxious to push a project through the NEPA process without completing the necessary analysis to ensure that environmental concerns are considered. The appropriate response to "limited knowledge" and "uncertainty" would be to complete the necessary—and in many cases required—scientific analysis of the cumulative impacts of various projects on the environment. Projects should not be exempt from scientific analysis when there is legitimate concern regarding probable environmental degradation. For example, here in the Colville National Forest, NEPA policy that included "adaptive management strategies" could be used to further justify changes in the way ORV use is managed, without doing the necessary scientific analysis of cumulative impacts such forest uses have on water quality, non-motorized recreation, roadless issues, wildlife habitat needs, and other environmental concerns.

E. It should be made more difficult to exclude a project from the EA/EIS process if there is any doubt that there will be an impact on the environment. This should include most projects. However, general maintenance and other projects that are likely to have an undisputed impact of little or no significance should be granted CE status as the current process allows. Strengthen the CE definition (Section 1508.4) to limit the size, impact, and other features of an action so that only truly CE type actions are covered and not heavily impacting activities like logging, roadbuilding, wetlands destruction, mining, oil/gas activities, grazing, urbanization, etc.

F) We need to make NEPA stronger, not weaker. Please accept the following suggestions for improving, not weakening, the NEPA process:

- Require a specific cumulative impact analysis, assessment, and evaluation section in each Environmental Impact Statement (EIS),

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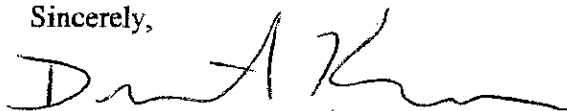
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Environmental Assessment (EA), Categorical Exclusion (CE), and Finding of No Significant Impact (FONSI).

- Require that all reasonable alternatives be covered in EIS/EA as stated in Section 1502.14(a). Currently, agencies often offer few if any reasonable alternatives. For example, the DEIS for the Quartzite timber sale, which is currently proposed in the area of the Quartzite roadless area on the Colville National Forest, didn't include an alternative that would keep logging out of the roadless area. Many members of the public have commented on this project, asking for an alternative that would focus thinning on the wildland urban interface, leaving the roadless area intact. By not including such a reasonable alternative, the Forest Service is slowing down the NEPA process.
- Require that all CEQ rules that apply to EIS's, also apply to EA's. Since EA's play the vital role of determining whether an EIS is required, the same rules in preparing an EIS should apply to an EA. Otherwise, the real impacts of a proposed project will not be revealed to the public if further analysis is needed.
- Require that agencies implementing NEPA regulations mirror CEQ regulations and do not re-interpret what NEPA and CEQ require.
- Restore Section 1502.22 that required agencies to develop important information if it can be developed in a reasonable timeframe.
- Do not exempt fuel reduction projects, defense projects, or any other resource extraction projects from NEPA.
- Agencies need to be held accountable to the law. NEPA should not be weakened to allow environmentally destructive projects to go ahead. What is the point of having laws like NEPA if they are not enforced?

Once again, we ask you to stand up to political pressure to weaken NEPA. Our nation's environmental laws need to be enforced, not ignored. Our quality of life and a clean, healthy environment are some of the things that make this country so great. Please make your decisions in regards to NEPA wisely and in the public's best interest for generations to come.

Sincerely,



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